

IN THE UNITED STATES DISTRICT COURT  
FOR DISTRICT OF DELAWARE

HONEYWELL INTERNATIONAL INC.,  
and HONEYWELL INTELLECTUAL  
PROPERTIES INC.,

Plaintiffs,

v.

HAMILTON SUNDSTRAND  
CORPORATION,

Defendant.

Civil Action No. 99-309-GMS

**DEFENDANT'S NOTICE OF 30(b)(6) DEPOSITION**

TO:

Thomas C. Grimm  
Morris Nichols Arsh & Tunnell  
1201 N. Market Street  
P.O. Box 1347  
Wilmington, DE 19899-1347

Jonathan Putman  
Lee Ann Stevenson  
Michael Strapp  
KIRKLAND & ELLIS LLP  
Citigroup Center  
153 East 53<sup>rd</sup> Street  
New York, New York 10022

**PLEASE TAKE NOTICE** that Defendant, Hamilton Sundstrand Corp. ("Sundstrand"), will take the deposition of Honeywell International, Inc. ("Honeywell") for all purposes permitted by Rule 30(b)(6) of the Federal Rules of Civil Procedure, at the offices of Bartlit Beck Herman Palenchar & Scott LLP, 54 West Hubbard, Suite 300 Chicago, IL 60610 commencing on a date and time to be agreed upon by the parties and continuing from day to day until complete. The deposition shall be recorded by audio, video and/or stenographic means. You are invited to attend and cross-examine.

Pursuant to Fed. R. Civ. Proc. 30(b)(6), Honeywell is required to designate one or more officers, directors, agents, or other persons to testify on its behalf as to the matters set forth in Attachment A.

November 8, 2005

THE BAYARD FIRM

/s/ Richard D. Kirk (rk0922)  
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and

David H. Herrington  
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**ATTACHMENT A****DEFINITIONS AND INSTRUCTIONS**

Sundstrand incorporates the definitions and instructions set forth in its First Set of Requests for Inspection and for Production of Documents and Things and its First Set of Interrogatories.

**30(B)(6) TOPICS**

1. The use of inlet guide vane position in the surge control system for any gas turbine engine, including without limitation auxiliary power units, designed, developed, manufactured, offered for sale, or sold, or described in the prior art or literature, prior to December 31, 1988.
2. The use of static pressure or total pressure measurements in the diffuser of a compressor in any gas turbine engine, including without limitation auxiliary power units, designed, developed, manufactured, offered for sale, or sold, or described in the prior art or literature, prior to December 31, 1988.
3. The existence of an "inverted V/double solution" characteristic in the diffuser of a gas turbine engine, including without limitation an auxiliary power unit, designed, developed, manufactured, offered for sale, or sold, or described in the prior art or literature, prior to December 31, 1988.
4. The use of temperature as an input in a surge control system for any gas turbine engine, including without limitation auxiliary power units, designed, developed, manufactured, offered for sale, or sold, or described in the prior art or literature, prior to December 31, 1988.
5. Any surge control system for a gas turbine engine, including without limitation

an auxiliary power unit, designed, developed, manufactured, offered for sale, or sold, or described in the prior art or literature, prior to December 31, 1988.

**CERTIFICATE OF SERVICE**

The undersigned counsel certifies that, on November 8, 2005, he electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send automatic notification of the filing to the following:

Thomas C. Grimm, Esq.  
Leslie A. Polizoti, Esq.  
Morris, Nichols, Arsh & Tunnell  
1201 N. Market Street  
Wilmington, DE 19801

The undersigned counsel further certifies that, on November 8, 2005, the foregoing document was served by email and by hand on the above local counsel and by email and U.S. Mail on the following non-registered participants in Court:

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